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Phase I Environmental Site Assessment

Site Location:

King County Tax Parcels:

**7327902500, 7327902520, 7327902480, 7327902490,
7327903645 and 7327906860**

**Silver Bay Logging Property
7808, 7814 8th Avenue South
Seattle, Washington**

March 31, 2010

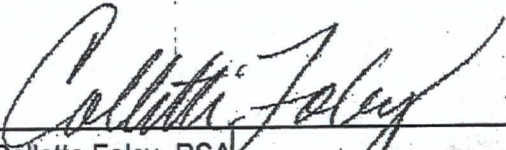
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EXECUTIVE SUMMARY

Environmental Management Services (EMS) has performed a Phase I Environmental Site Assessment (ESA) in general accordance with American Society for Testing Materials (ASTM) "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," (ASTM E 1527-05) for King County Tax Parcels: 7327902500, 7327902520, 7327902480, 7327902490, 7327903645, and 7327906860 located at 7808 and 7814th Avenue South, Seattle, Washington (the "Subject Property"). The Phase I ESA is designed to provide an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the Subject Property at the time of the inspection.

The Subject Property is located south of Downtown Seattle in the South Park Neighborhood in King County, Washington (Figure 1). The Subject Property occupies land on the east side of 8th Avenue South from South Kenyon Street north to the Duwamish Waterway. The Subject Property is commercially developed and currently houses two businesses: Independent Metals Company (a metal recycling facility), and Seattle Marine Facility Hot Works (barge welding) that is currently conducting business at Silver Bay Logging Company. Refer to Appendix A, Project Figures.

On March 18, 2010, EMS environmental professional, Collette Foley, conducted a site reconnaissance to assess the Subject Property, to the extent possible, for the presence of environmental conditions (RECs), hazardous materials or other potential environmental liabilities. No visible indications of any recognized environmental condition was identified at the Subject Property during the site reconnaissance. Several 55-gallon drums were identified at various locations throughout the Subject Property. These drums are reported to be utilized for non-hazardous waste.

Surrounding properties were also visually examined for land use and any site activities that may warrant further investigation. The land use of the surrounding properties is primarily single-family residential with a few commercial/light industrial businesses. A cursory inspection of adjacent properties revealed no visible evidence of any recognized environmental condition (RECs) that may signify possibility of impact to the Subject Property.

EMS's investigation also included review of historical site use research, interviews with persons with knowledge of the Subject Property, and review of available local, state, and federal regulatory records regarding historical site use on the Subject Property and adjacent properties. Records reviewed indicate the first commercial development at the Subject Property as a corner store by 1904 and two stores with a hall above in 1917 at the southwest parcel. By 1929, an

automobile repair and battery shop appear at the northwest corner that changes to a concrete wash tray manufacturer by 1940. From 1960 to the present, business occupants of the Subject Property include an insecticide packaging facility, a logging company and several boat manufacturing and supply companies. Three areas of the Subject Property were identified with businesses that are reported to have utilized, stored, or transferred petroleum product and/or other processing chemicals representing historical RECs.

EMS obtained and reviewed a database report from Environmental Data Resources, Inc. (EDR) for the Subject Property and the surrounding area. The target Property is listed on nine environmental regulatory databases (A1, A2, A3, A4, A5, B7, A10, A11, and B12) researched by EDR. The EDR database listings for the Subject Property include ALLSITES, EDR Historical Auto Station, ERNS, FINDS, FTTS, RCRA-CESQG, RCRA-NonGen, SPILLS, SSTS and UST. These database listings primarily represent business registrations for product production and waste disposal. The spills appear as a small amount at the northern portion of the Subject Property. The presence of former storage, use and transfer of petroleum product at the Subject Property present RECs. The presence of these database listings indicates that there may be a low risk of the Property impacting the surrounding area. Refer to Section 5.0 for further information regarding the Subject Property database listings.

The EDR report lists 246 plotted database occurrences within ASTM search radius from the Subject Property. The reported listings include numerous databases. Refer to the EDR Report attached in Appendix B. The Subject Property neighborhood along the west banks of the Duwamish Waterway and many listed sites are beyond contamination migration pathways. Downgradient and cross-gradient properties, 239 listings, are not considered to present potential risk of impact to the Subject Property due to the distance from and lack of contaminant pathway. EMS focused the database investigation to seven listings immediately up-gradient and/or adjacent to the Subject Property. Of these seven listings, only two were identified as potential RECs; **EDR 0** - Lower Duwamish Waterway NPL Superfund Site that includes the Subject Property and surrounding vicinity, and **EDR C13, C14** - Interstate Coatings Inc (western adjacent) at 754 S. Chicago St is listed on ALLSITES, CSCSL, HSL, ICR, LUST, and RCRA-NonGen databases.

EMS performed a review of the remaining 239 EDR listed sites on the database report and found they are located cross-gradient, downgradient, and/or beyond potential contaminant migration pathways from the Subject Property. Based on the types of listings, listed status of these sites and the locations relative to the Subject Property being below gradient, cross gradient, or beyond contaminant conveyance limitations, the potential risk of impact to the Subject Property from these EDR listed sites is considered to be negligible.

The EDR report lists twenty (20) sites that were unmappable by their system. EMS reviewed the locations of these unmapped sites during this study and each was found either to be located outside the standard ASTM search radii, beyond conveyance parameters, and/or appear to present little or no risk of any potential impact to the Subject Property due to the type of listing and/or current status.

CONCLUSION

EMS has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-05 and AAI for King County Tax Parcels: 7327902500, 7327902520, 7327902480, 7327902490, 7327903645, and 7327906860 located at 7808 and 7814th Avenue South, Seattle, Washington. Completion of this Phase I Environmental Site Assessment did not encounter any significant data gaps in historical research. Any exceptions to or deletions from this practice are described in Section 2.4 of this report.

FINDINGS

This Phase I ESA has revealed evidence of three on-site historical RECs at locations within the Subject Property identified with business activities that are reported or been suspected of utilizing, storing, or transferring petroleum product and/or other processing chemicals.

Two off-site RECs were identified with the potential to impact the Subject Property. The Lower Duwamish Waterway Superfund Site that includes a portion of the riverbank at the eastern boundary of the Subject Property. As of this report, the Silver Bay Logging Company and other past and present on-site businesses are not named as potentially liable/responsible parties to the Duwamish Waterway Superfund Site. The northwestern adjacent property, Interstate Coatings, is listed by the Washington State Department of Ecology as a hazardous waste site with impacted soil confirmed and suspected impact to groundwater.

This executive summary is presented solely for introductory purposes and the information contained in this section should be used only in conjunction with the full text of this report. A complete description of the project, visible site conditions, investigative methods, and assessment results is contained within this report.

1.0 INTRODUCTION

Environmental Management Services (EMS) was retained by Independent Metals owner Mick O'Farrell to conduct a Phase I Environmental Site Assessment (ESA) of King County Tax Parcels: 7327902500, 7327902520, 7327902480, 7327902490, 7327903645, and 7327906860 located at 7808, 7814 8th Avenue South, Seattle, Washington (the "Subject Property"). The protocol used for this assessment is in general conformance with ASTM E 1527-05 and EPA AAI, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

On March 18, 2010 EMS environmental professional Collette Foley conducted a site reconnaissance to assess the possible presence of petroleum products as well as any other potential hazardous materials at the Subject Property. This investigation also includes review of aerial photos, reconnaissance of adjacent properties, background research, and review of available local, state, and federal regulatory records regarding the presence of petroleum products and/or hazardous materials at the Subject Property.

EMS contracted Environmental Data Resources, Inc. (EDR) of Milford, Connecticut, to perform a computer database search for local, state, and federal regulatory records pertaining to recognized environmental conditions and concerns for the Subject Property and surrounding properties (see Section 6.0).

1.1 PURPOSE OF STUDY

The purpose of this Phase I ESA was to identify, to the extent feasible, recognized environmental concerns (RECs) resulting from the improper use, manufacture, storage and/or disposal of hazardous or toxic substances that could affect the future acquisition, financing, and/or development of the Subject Property. This study is intended to satisfy the level of effort often referred to as "due diligence" in the Superfund Amendment and Reauthorization Act of 1986 (SARA), and similar requirements promulgated in the Model Toxics Control Act (MTCA), Chapter 70.105 D (Section 040) RCW with regard to liability.

1.2 METHODOLOGY/SCOPE OF WORK

This Phase I ESA was conducted in general accordance with procedures outlined in ASTM E 1527-05, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." ASTM E 1527-05 uses the term "recognized environmental conditions" to assess environmental risks associated with a Subject Property. The term is defined as "the presence or likely presence of any hazardous substances or petroleum products on a property

under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the Subject Property or into the ground, groundwater, or surface water of the Subject Property." The term is not intended to include "de minimus" conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The scope of work for this study included the following tasks:

- Review of various sources of historical information including reverse city street directories such as those published by Polk, Inc. and Cole, Inc.; fire insurance maps, aerial photographs; and topographic maps of the Subject Property and vicinity.
- Reconnaissance of the Subject Property and surrounding area to search for visual and/or olfactory evidence of contamination such as stained soils, unusual odors, distressed vegetation, pipes, drums, oil sheens and/or discolored water, and improper manufacturing or waste disposal practices.
- Review of current federal databases including the EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), the EPA National Priority List (NPL), the EPA Resource Conservation and Recovery Act (RCRA) Notifiers, RCRA Corrective Action Report (CORRACTS), Facility Index System (FINDS), Emergency Response Notification System (ERNS), and other lists.
- Review of current state databases including the Washington State Department of Ecology (Ecology) listing of underground storage tanks (UST), Leaking Underground Storage Tank (LUST) listing, and Confirmed and Suspected Contaminated Sites List (CSCSL).
- Interviews with owner(s) past and present, as well as local and state regulatory personnel who may have knowledge of the Subject Property or have access to records pertaining to the Subject Property.
- Preparation of this report.

1.3 ASSUMPTIONS

Certain information used by EMS in this assessment was obtained from sources believed to be reliable, including the EPA, the state environmental agency, and personal interviews. EMS is

not responsible for erroneous, inaccurate, omitted, or misleading information supplied to EMS during this investigation or for opinions based on such information. Should such information prove to be inaccurate or unreliable, EMS reserves the right to amend or revise its conclusion, opinions and/or recommendations. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide Independent Metals Company and designated agents with information relating to the Subject Property.

1.4 LIMITATIONS AND EXCEPTIONS

Because the EMS report is based upon information, the accuracy of which was not determined, and because EMS observations made during the site reconnaissance were limited as stated above, EMS cannot and does not guarantee that the Subject Property is free of hazardous or potentially hazardous materials or conditions, or that latent or undiscovered conditions will not become evident in the future. Since Subject Property activities beyond EMS's control could change at any time after the completion of this assessment, the observations, findings and opinions can only be considered valid as of the date hereof.

Specific limitations and exceptions to this Phase I ESA are more specifically set forth below:

- The previous Subject Property owners were unavailable for interview. Owners of six surrounding residences that were available for interview did not have any specialized or historic knowledge of the Subject Property.

1.5 SPECIAL TERMS AND CONDITIONS

No special terms and conditions have been specified in conjunction with the site investigation, present or historical research, and ESA report production.

1.6 USER RELIANCE

This Phase I Environmental Site Assessment report is for the exclusive use of Independent Metals Company and/or designated agents or assigns. The purpose of this report is to provide these parties with an assessment of the potential for the presence of contamination on or adjacent to the Subject Property prior to potential purchase of the Subject Property. This report is neither an endorsement nor a condemnation of the Subject Property.

2.0 SUBJECT PROPERTY DESCRIPTION

2.1 LOCATION

The Subject Property is located along the west bank of the Lower Duwamish Waterway in Seattle, Washington. The Subject Property occupies the land on the east side of 8th Avenue South from South Kenyon Street north toward the Duwamish Waterway. The Public Land Survey System lists the geographic coordinates of the Subject Property as the southeast quarter section of Section 29 in Township 24 North and Range 04 East of the Willamette Meridian. The Subject Property is developed commercially and a site diagram is attached in Figure 3 of Appendix A. Subject Property photographs are also presented in Appendix A.

2.2 LEGAL DESCRIPTION OF SUBJECT PROPERTY

The Subject Property is comprised of six adjoining parcels identified by King County Tax Assessor Parcels: 7327902500, 7327902520, 7327902480, 7327902490, 7327903645, and 7327906860 and are currently addressed as 7808 and 7814 8th Avenue South, Seattle, Washington. The approximate square footage of the combined parcels is 135,379 square feet (3.4 acres). The Assessor's office reports transaction dates to Silver Bay Logging Company as August 1997 (parcel ending -2500) and September 1995 (the other five parcels). A complete legal description is included in Appendix C of this report. The following table includes the King County abbreviated legal description for each parcel of the Subject Property:

Parcel Numbers	Abbreviated Legal Description
7327902500	RIVER PARK ADD
7327902520	RIVER PARK ADD LOTS 10 THRU 22 TGW LOTS 29 THRU 48 LESS CWW #1 TGW POR VAC ST ADJ PER VAC ORD #114970
7327902480	RIVER PARK ADD
7327902490	RIVER PARK ADD
7327903645	RIVER PARK ADD LESS CWW #1 TGW POR VAC ST ADJ PER VAC ORD #114970
7327906860	RIVER PARK ADD N 100 FT OF W 150 FT

2.3 SUBJECT PROPERTY AND VICINITY GENERAL CHARACTERISTICS

The Subject Property is located south of Seattle in the South Park Neighborhood on the west side of the Lower Duwamish Waterway. The South Park Neighborhood was primarily developed residentially as early as the 1880's by Italian and Japanese farmers. After World War II, industrial

and commercial businesses increased along the Duwamish Waterway, primarily toward the east and south of the vicinity. The zoning for the Subject Property and surrounding is a combination of industrial and low-density residential. Photographs of the Subject Property and adjacent properties are included in Appendix B:

- **North:** Lower Duwamish Waterway, Boeing Company
- **East:** Lower Duwamish Waterway, Slip 4, Boeing Plant No. 2
- **South:** Primarily single family residences, Sound Propeller Services
- **West:** Primarily single family residences, Morton Marine Equipment
- **Northwest:** Metro Pump Station, Lukas Machine

3.0 PHYSICAL SETTING

Geologic conditions can often affect, to some extent, the environmental integrity of Subject Property. Underlying soil and bedrock formations may facilitate or impede the migration of chemical contaminants in groundwater, and may even be the source of contaminants such as radon and metals. This section of the report summarizes geologic factors that may affect the Subject Property with regard to environmental concerns.

3.1 TOPOGRAPHY

The United States Geological Survey (USGS), Quadrangle Seattle South, WA Quadrangle 7.5-Minute series topographic map (1983) was reviewed for this ESA (See Figures). According to the contour lines on the topographic map, the Subject Property is located at approximately 10 feet above mean sea level (amsl). The contour lines in the vicinity of the Subject Property indicate a low topographic gradient toward the northeast. According to King County GIS Services that shows five foot contour lines across the parcel, the parcel is relatively flat except for near the river bank where the slope is down toward the northeast. The Lower Duwamish Waterway flows along the Subject Property boundary from the southeast corner to the northern tip.

3.2 GEOLOGY AND SOILS

The Subject Property is located in the region of the Puget Lowlands an elongated topographic and structural depression filled with complex sequences of glacial and nonglacial sediments that overlie bedrock. Continental ice sheets up to 3,000 feet thick covered portions of the Puget Lowland several times during the Quaternary period. Retreating ice carved new landscapes, rechanneled rivers, drained or formed lakes, and deposited glacial drift including till and outwash (WA DNR, 2002). According to the Geologic Map of Seattle, the Subject Property and surrounding properties overlie Holocene age, non-glacial alluvium (Qal) stream deposits up to 100 feet thick that primarily consist of sand, silt, gravel, and cobbles with occasional peat lenses (Troost, Booth, Wisher, & Shimel, 2005).

The Natural Resources Conservation Services (NRCS) Washington Soil Survey Report for King County, Washington indicates no current soil maps are available for the vicinity of the Subject Property. This is typical of soil surveys in historically urban settings, due to the amount of fill material that may have been brought in, massive excavating and/or most surfaces are covered by buildings or asphalt. The Washington State University provides a Washington State Soils Website and reports the soils for the riverbank areas along the Duwamish Waterway with

Pilchuck soil series components. These soils are characterized by well to excessively well drained soils with rapid permeability, slow runoff and low available water capacity. Pilchuck loamy sand formed in alluvium on low stream terraces and floodplains.

3.3 HYDROGEOLOGIC ENVIRONMENT

The primary aquifers in the Puget Sound region are typically overlain by relatively impermeable Pleistocene glacial deposits that are present at or near the ground surface. Within these deposits are localized areas or lenses of water-bearing sands and gravels that may result in a shallow, perched water table. Lateral and vertical migration of shallow groundwater may be impeded by the relatively impermeable nature of the till and by the sometimes-discontinuous nature of the perched water-bearing sands and gravel. Perched and discontinuous zones of shallow groundwater may be seasonally or perennially present, depending on site-specific conditions. Locally the hydrology is influenced by alluvial aquifers within the Duwamish River Valley.

Drinking water to the vicinity of the Subject Property is provided the Seattle Public Utilities water system that receives water from the Tolt River and Cedar Rivers. Shallow groundwater flow directions fluctuate and tend to follow topographic gradient but are also affected by seasonal high water tables and variable soil porosity characteristics. Groundwater is reported to flow northeast toward the Lower Duwamish Waterway.

A review of Washington State Department of Ecology well logs for the Subject Property vicinity within one-eighth mile indicates depth to groundwater ranges from approximately 3 - 15 feet below ground surface (bgs). The well logs for the Subject Property show depths to groundwater that range from 6 to 10.5 feet bgs.

3.3.1 Flood Plain Information

A review of the Flood Insurance Rate Maps (FIRM), published by the Federal Emergency Management Agency (FEMA), was performed. According to Panel Number 530183 0009 C, dated October 17, 1986 the Subject Property is located in Flood Zone C. Flood Zone C regions consist of those areas of minimal flooding. However, the western adjacent properties are within the 100-year floodplain.

4.0 SITE RECONNAISSANCE

On March 18, 2010 EMS environmental professional, Collette Foley, conducted a site reconnaissance in order to assess the possible presence of environmental conditions, hazardous materials or other potential environmental liabilities at the Subject Property. EMS observed on-site conditions and land use practices on the Subject Property as well as on adjacent and nearby properties. No indications of any recognized environmental condition was identified at the Subject Property during the site reconnaissance. Several 55-gallon drums were identified at various locations throughout the Subject Property. These drums are reported to be utilized for non-hazardous waste. Labeling suggestions were made during the site walk.

4.1 GROUNDS

The Subject Property is occupied by a metal recycling facility and a barge welding company and includes approximately 3.4 acres of fenced land. The Independent Metals Company (IMC) recycling operations are conducted on the southern portion of the Subject Property that includes a warehouse, a smaller warehouse to the east, and two vacant dwellings. The northern portion of the Property is utilized by Silver Bay Logging Company for some heavy equipment storage and currently by Seattle Marine Facility Hot Works. The northern area is paved and includes a barge dock, an office in a single wide mobile, and an old metal building at the northern boundary. An additional parcel of the Silver Bay Logging Company Property includes the corner of S. Kenyon Street and 8th Avenue South that houses a fenced vehicle parking area. Refer to Appendix A, Figures, for photographs.

The IMC recycling facility receives scrap metals that are brought in by truck or project container. The scrap metals are visually inspected by IMC to determine scrap is acceptable. No hazardous materials are accepted. Metal scrap is unloaded into staging areas separated by cement ecology blocks. Metals are then sorted by large mobile crane and mobile shear by type of metal. Large steel reinforced plates overlie the asphalt to support the heavy equipment. Large pieces of metal scrap are cut, compiled and shipped loose for processing off-site. Smaller size and shaped materials are cut, crushed and/or compacted together with a bailing machine prior to shipping. The reprocessed metals are packaged, weighed, and transported off-site by truck at the east end of the warehouse.

Several cutting rigs (torches) are run with oxygen propane. Oxygen propane cylinders are secured with chain and concrete block, and properly labeled. Six labeled 55-gallon drums (three were empty) for waste oil or used sorbent cloths are located in the shop. All waste oil is collected and recycled periodically by American Petroleum Environmental Services, Inc.

American Petroleum Environmental Services also collects any waste material drums of absorbent and diapers. No solvents of any kind are utilized on-site.

Surface water from the parking lot drains to one stormwater catch-basin near the center of the Subject Property. The catch basin discharges into an oil-water separator then the water flows into an enclosed water filtration system, in which the water is continuously cleaned before discharging into the Duwamish Waterway. The eastern property boundary includes a raised asphalt berm. The Subject Property has a current NPDES permit with the Washington State Department of Ecology (Ecology) and King County. Photographs are included in Figures, Appendix B.

4.2 SURROUNDING PROPERTIES

Neighboring properties are primarily occupied by residential parcels to the south and west. The northwest adjacent site is a small park owned by Seattle Light, also identified as the Metro Pump Station. Farther northwest is Lukas Machine. Across the Duwamish Waterway are Boeing Company Plant 2 and Slip 4. South of the southernmost parcel of the Subject Property is Sound Propeller Services. Morton Marine Equipment occupies the parcel west of the Subject Property at the northeast corner of the intersection of S. Chicago Street and 8th Avenue South. None of the adjacent or surrounding properties are considered to be at a higher gradient than the Subject Property. A cursory inspection of adjacent properties revealed no visible recognized environmental conditions to the Subject Property. Refer to the Subject Property Diagram in Appendix A for layout of surrounding properties.

4.3 INTERVIEW

An environmental interview was conducted with IMC Operations Manager, Larry Brewer, on March 18, 2010 at the time of the site reconnaissance. Mr. Brewer explained the facility operations, provided copies of environmental documents, permits and stormwater pollution prevention plan, and also guided the site walk of the facilities. No recognized environmental conditions were identified.

4.4 RECORDED DOCUMENTS

The King County GIS website was reviewed for the Subject Property. There were no returns for code enforcement or violations listed. A review of recorded documents available on the King County website did not disclose any evidence of recognized environmental conditions, concerns or violations.

4.5 POTENTIAL ENVIRONMENTAL CONDITIONS

4.5.1 Radon

The US Environmental Protection Agency (EPA) has prepared a map to assist National, State and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones. It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at a specific location. The Subject Property is located in Zone 3, where average predicted radon levels are less than 2.0 picoCuries per liter.

4.5.2 Polychlorinated Biphenyls (PCBs)

Two large, pad-mounted transformers were identified at the Subject Property. One located at the southeast end of the large warehouse and the other near the entrance at the end of S. Chicago Street, just inside the entrance to the right. There was one utility pole west of the northern Property entrance that was identified with three pole-mounted can transformers. There appears to be "No PCB" labels on each canister. Seattle Public Utilities maintains city transformers on a periodic basis.

Fluorescent light ballasts manufactured prior to 1978 may contain PCBs. Due to the height of the pole-mounted light fixtures, a visual determination of the presence or absence of "No PCBs" labels could not be confirmed. If the light fixtures have fluorescent light ballasts that do not specify PCB content, they should be presumed PCB containing and recycled at a participating ballast recycling center.

4.5.3 Septic System

Four buildings are located at the Subject Property that are reported to be connected to the municipal sewer system.

4.5.4 Stormwater System

Surface water from the parking lot drains to one stormwater catch-basin near the center of the Subject Property. The catch basin discharges into an oil-water separator then the water flows into an enclosed water filtration system, in which the water is continuously cleaned before discharging into the Duwamish Waterway. The Subject Property has a current NPDES permit with the Washington State Department of Ecology (Ecology) and King County.

4.6 PREVIOUS ENVIRONMENTAL REPORTS

A Phase I Environmental Site Assessment was conducted in March of 2002 at the Subject Property by the Riley Group that identified both on-site and off-site RECs. On-site RECs identified several areas of suspected USTs, chemical usage in the production of slug bait, boat manufacturing and repair, including boat painting. Additional on-site RECs included identification of a historic auto repair shop with a battery shop. Off-site RECs identified by the Riley Group included all upgradient database listed sites due to the proximity inside the Lower Duwamish Waterway Superfund Site.

The Riley Group also completed a Phase II Subsurface Site Investigation dated February 2004 at the Subject Property for Silver Bay Logging Company. Ten of the eleven soil samples collected had non-detectable or levels below the respective Model Toxics Cleanup Act (MTCA) Method Soil Cleanup Levels for Industrial Properties. One shallow sample collected from the southeast portion of the Subject Property exhibited levels of cadmium exceeding MTCA cleanup levels. Riley Group also conducted geophysical survey indicating the possible presence of two USTs at the northern portion of the Subject Property and one UST in the southeastern storage yard. Additionally, five monitoring wells were installed at various locations across the Property. Laboratory analysis of the water samples reported elevated concentrations of diesel at MW4 of 570 micrograms per liter ($\mu\text{g/L}$) above the MTCA-A cleanup level of 500 $\mu\text{g/L}$. Elevated concentrations of PCE at 16 $\mu\text{g/L}$ (above the MTCA cleanup level of 5 $\mu\text{g/L}$), were detected from water sample MW5 near the southeast corner of the Property. Elevated concentrations of arsenic were identified in three of the five monitoring well water samples and Riley Group suggested the concentrations may represent naturally occurring and/ or background concentrations of, as being associated with the Lower Duwamish Waterway area.

5.0 REGULATORY AGENCY RECORDS

A review of regulatory agency records was conducted for the Subject Property and nearby properties to identify known or potential sources of contamination that could adversely affect the Subject Property. Records were obtained using the commercial database search services of Environmental Data Resources, Inc (EDR), which queries U.S. Environmental Protection Agency (EPA), Ecology, and other similar databases. The commercial database search report was reviewed for accuracy of site locations and modified appropriately. The complete EDR report number 2721506.2s, dated March 16, 2010 is included in Appendix B and contains figures showing the approximate locations of the reportable sites within the appropriate search radius for each database queried.

The absence of records should not be used as conclusive evidence that conditions do not exist. Site specific conditions may not have been reported or registered and/or may pre-exist the requirement to report or register. Each site located in the search is assigned an alphanumeric identifier. Definitions of the database acronyms are found on pages GR-1 through GR-15 of the EDR Report. In some cases, location information supplied by the regulatory agencies is insufficient to allow the database companies to geocode facility locations. These facilities are listed under the Orphan Summary section within the EDR report.

5.1 SUBJECT PROPERTY

The target Property is listed on a total of nine environmental regulatory databases researched by EDR. These database listings include:

EDR A1, A4 - SPILLS, ERNS: In April of 2005 less than one gallon of petroleum product was reported as released to the surface water in the Duwamish Waterway near the Subject Property.

EDR A2 - FTTS: General product review with inspections on November 1991 and March 1995 that indicated no production violations (Matson Co. Inc).

EDR A3 - SSTs: Registration for Insecticide production to Matson Co. Inc. (Corry's Slug & Snail Death) dated 1990, 1991, and 1992 (Corry's Slug, Snail & Insect Killer and Spectracide Snail & Slug Killer).

EDR A5 - RCRA-CESQG: (also former LQG) Workboats Northwest (1993 - 1995) was registered as a conditionally exempt small quantity generator of 100 kg or less hazardous waste per month.

EDR B7 - RCRA-NonGen, ALLSITES, UST: Service Specialties, Inc (800 S. Kenyon St) was registered as a handler/ non-generator of hazardous waste in 1987 and no violations were reported. Four underground petroleum storage tanks were reported as closed in place in August of 1996. This listing is a REC.

EDR A10 - ALLSITES, SPILLS: Silver Bay Logging Inc was reported with a 2-gallon diesel fuel spill in December of 2005 and a 10-gallon diesel spill in July of 2006.

EDR A11 - EDR Historical Auto Station: Bridge Auto Supply is listed at the Subject Property, addressed as 7756 8th Ave S, and operated as an automobile repair shop. This listing is a REC.

EDR B12 - RCRA-NonGen, ALLSITES: WA ECY was registered as a handler/ non-generator of hazardous waste (832 S. Kenyon St) in 1987 and no violations were reported.

These database listings primarily represent business registrations for product production and waste disposal. The spills appear as a small amount at the northern portion of the Subject Property. The presence of former storage, use and transfer of petroleum products at the Subject Property present RECs. The presence of these database listings indicates that there may be a low risk of the Property impacting the surrounding area.

5.2 SURROUNDING PROPERTIES

The EDR report lists 246 plotted database occurrences within ASTM search radius. The reported listings include numerous databases. Refer to the EDR Report attached in Appendix B. The Subject Property neighborhood along the west banks of the Duwamish Waterway and many listed sites are beyond contamination migration pathways. Downgradient and cross-gradient properties, 239 listings, are not considered to present potential risk of impact to the Subject Property due to the distance from and lack of contaminant pathway. EMS focused the database investigation to seven listings immediately up-gradient and/or adjacent to the Subject Property.

EDR 0 The Lower Duwamish Waterway is listed on the EDR database report NPL. The U.S. Environmental Protection Agency added this site to the Superfund list in 2001 as one of the nation's most contaminated hazardous waste sites due to the contamination in the sediments. Contaminants identified include polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), mercury and other metals, and phthalates (plasticizers). Remedial action has been in progress and is on-going. This site is a REC to the Subject Property. The Subject Property and surrounding parcels are located within the NPL site area.

B6 Reamco Electronics at 817 S. Kenyon St was registered on the RCRA-NonGen database dated December 1985. The EDR report states no violations were identified. This listing does not present a REC to the Subject Property.

B8, B9 West Fork Nelson Incorporated (southern adjacent) at 7916 8th Avenue S is listed on the ALLSITES and UST databases. One tank is reported as removed from the site January of 2001. This listing does not present a REC to the Subject Property.

C13, C14 Interstate Coatings Inc (western adjacent) at 754 S. Chicago St is listed on ALLSITES, CSCSL, HSL, ICR, LUST, and RCRA-NonGen databases. This site is ranked priority 2 and awaiting remedial action of confirmed petroleum product and EPA Priority metals and cyanide to the soils with non-halogenated solvents and halogenated organic compounds suspected. The groundwater, surface water, and air at this site are also suspected to be represented by similar impact. The site was placed on the CSCSL in March of 1991. The preliminary clean-up report for the LUST list shows clean-up and the submitted report dated as December 1998. The UST was reported removed in 1999. The current status is awaiting remedial action. This site is at a lower topographic gradient but there is potential for groundwater exchange. This listed site is considered to be a REC to the Subject Property.

H32 Lukas Machine (northwest adjacent) at 707 S Riverside Drive is listed on the ALLSITES, MANIFEST and RCRA-NonGen databases. The EDR-report states no violations were identified. This site does not present a REC to the Subject Property.

EMS performed a review of the remaining 239 EDR listed sites on the database report and found they are located cross-gradient, downgradient, and/or beyond potential contaminant migration pathways from the Subject Property. Based on the types of listings, listed status of these sites and the locations relative to the Subject Property being below gradient, cross gradient, or beyond contaminant conveyance limitations, the potential risk of impact to the Subject Property from these EDR listed sites is considered to be negligible.

5.3 ORPHAN SUMMARY

The EDR report lists twenty (20) sites that were unmappable by their system. EMS reviewed the locations of these unmapped sites during this study and each was found either to be located outside the standard ASTM search radii, beyond conveyance parameters, and/or present little or no risk of any potential impact to the Subject Property due to the type of listing and/or current status.

5.4 AGENCY INTERVIEW

5.4.1 Seattle Fire Department

EMS contacted Seattle Fire Department (SFD) by telephone on March 25, 2010 to inquire site response records, permits and/or any historical records regarding inspections for the Subject Property. SFD permit files indicate Marine Hot Work and Temporary Marine Hot Work permits (code 4915) in the digitized database from 1999 until present for the businesses at 7760 8th Avenue South. Additionally, annual permits for storage of Liquid Petroleum Gas (LPG) are also on file. No code violations were indicated.

6.0 HISTORICAL REVIEW

Information regarding the history of environmental issues on the Subject Property and land uses in the area was gathered through interpretation of aerial photographs of the Subject Property locality, historical city directories, fire insurance maps, topographic and historical maps. Adequate historical coverage of the Subject Property was obtained with no significant gaps in data.

6.1 FIRE INSURANCE MAPS

Sanborn Fire Insurance Map coverage for the Subject Property is available for 1967, 1950, 1929, 1917, and 1904. Copies of certified Sanborn Maps are included in Appendix B. Fire insurance maps of the surrounding properties were also reviewed in order to identify any potential for impact to the Subject Property. The Subject Property appears on Sanborn blocks #2032, 2031, and the northwest corner of block 2030. Historical addresses for the Subject Property are shown to include:

8th Avenue S: 7748, 7750, 7754, 7758, 7760, 7766, 7802, 7808, 7818, 7900, 7902, and 7908
S. Chicago St: 803, 806, 809, 811, 812, 819, 820, 824, 831, and 837
S. Kenyon St: 802, 806, 816, 824, 832, 836, and 846

1967 - The northern portion of the Property (block 2032) has six dwellings. The northernmost dwelling has (7748, 7750, and 7754) an attached, concrete floored storage building. The center block 2031 of the Subject Property is depicted with twelve dwellings, five detached garages, and one business at 7808 8th Av S identified as insecticide packaging. The southwest corner of the Property is shown with two dwellings addressed as 7900 and 7908 8th Avenue S. The insecticide packaging facility is a REC.

1950 - Block 2032 of the Subject Property is the same except the northernmost building is marked as concrete wash tray manufacturing. The rest of block 2032 has five dwellings, one garage and two small storage buildings in the same locations as the 1967 map. Block 2031 has eleven dwellings, six with detached garages. No building is depicted at 7808. The southwest corner no longer shows a building at 7900, but the dwelling at 7908 is pictured.

1929 - The northwest corner of Block 2032 is shown as a concrete floored battery shop with storage marked on the north side and an automobile repair shop connected on the south side and gas and oil is identified on the west side of the shop. This finding is a REC. The rest of this block is depicted with four dwellings, a detached garage, and two storage buildings. The center portion of the Property, block 2031, is depicted with nine dwellings and five detached garages. The southwest portion of the Property (on block 2030) is shown with no buildings.

1917 - Four dwellings are shown in block 2032, nine dwellings on block 2031 with one storage building at the corner of 8th Avenue S and S. Kenyon St, and the southwest portion is shown as two stores with a hall on the second floor. The rest of block 2030 is marked as vegetable crop.

1904 - This map shows the layout of the Subject Property before the Duwamish River was channelized. The land extends eastward from the Property boundary twice as far to the end of the map without showing the eastern riverbank. The street names that run east west are named differently. No buildings are depicted on block 2032, five dwellings and a corner store appear at block 2031, and block 2030 is not shown on the map.

6.2 AERIAL PHOTOGRAPHS

Historical aerial photographs (aerials) were reviewed at the Washington State University, Suzallo Library by EMS. The dates of the aerials reviewed include: 1944, 1961, 1965, 1970, 1978, 1984-85, 1989, 1995, and 2001. Aerials were also provided by King County GIS website for the Subject Property dated 1936, 1998, 2002 and 2007. Due to the scale of the aerials, only primary features are reported below:

The 1936 aerial depicts the vicinity around the Subject Property as mostly undeveloped. One residence appears to the west and another to the southwest. The southern adjacent properties appear residentially developed. The Property appears to have trees and residences, but is vacant undeveloped in the western central portion. The northern section appears to be developed with five homes. The northwest corner structure appears to have more vehicle activity and is cleared of all vegetation on the west side of the building.

The 1944 aerial shows the vicinity as primarily undeveloped land. Across the Duwamish Waterway the airport flight lines and numerous large buildings. The Subject Property appears similar to the previous aerial and is directly southwest from the small water channel identified as Slip 4.

The 1961 and 1965 aerials depict the Subject Property vicinity with more residential dwellings and a few larger buildings appear farther west. The industrial development across the Duwamish Waterway is more distinct with extremely large buildings and more densely developed than the previous aerial. The river water appears to be covered extensively with a dense, light-colored substance. The Subject Property appears more developed and has two buildings on the southwest portion. The center portion appears with buildings on each lot. The northern portion appears to have buildings on each lot, with more vehicles at the northwest portion. The road at the northwest corner appears to extend through the Subject Property beyond the length of the corner structure that appears to be of commercial land use.

The 1970 shows the water level is higher and closer to the shores by approximately 50 feet. The street that formerly appeared to extend along the northern Property boundary no longer goes beyond 8th Avenue S. The structures at the northwest corner of the Property no longer appear, but four dwellings still appear on the northern portion. Fewer trees appear across the Subject Property. By 1978, the central eastern half of the Subject Property between S. Chicago and S. Kenyon St is cleared of buildings and has numerous commercial trucks. The west half of the existing warehouse is visible with cleared lot for parking on the west side. East of the warehouse has commercial truck parking and what appears to be two additional commercial buildings.

The 1984, 1985 and 1989 aeriels show new development at the northern portion of the Property with no buildings and the land completely paved. What appears to be a stationary dock is along the center of the northern section, along the waterway (where located today). The block between S. Chicago and S. Kenyon appears to be mostly commercially developed. A cleared parking area also is visible at the southeast corner of the Property. The southwestern parcel is depicted as in previous aeriels as two residences. Neighboring properties mostly appear as single family residential, with the exception of the northwest corner property that has a warehouse.

By 1995 the aerial depicts the warehouse is completed as it appears today. The barge dock has a long narrow extension to the southeast. The rest of the features are similar to the previous aeriels. The 2001 and 2002 aeriels show a mobile home unit on the northern section near the northwest entrance, flush with the property line. Sections of what appears to be stacked logs or wood product are situated through the center section of the Property. The former street extension from S. Chicago St is no longer visible as the central and southern portions of the Property appear to have been paved. The 2005 aerial depicts several boats instead of wood product. The southeast parking area is vacant and appears covered with grass. More recent aeriels show piles of scrap metal instead of boats and parking again in the grassy area formerly noted.

6.3 CITY DIRECTORIES

EMS reviewed historical Polk's and Cole's Seattle City Directories dated circa 1920 through 2005 at approximately 5-year intervals (or as available) for evidence of any potential environmental concerns at the Subject Property or surrounding areas, as well as to indicate land use, ownership, and /or support other historical research. Directory research started with review of the historical maps to determine the potential addresses and street names, and is then cross referenced with other historical data due to a potential for street address and or street name

changes in regard to the Subject Property. It is common for addresses to be reassigned as lot sizes change with sales/purchases. Listings for the Subject Property addresses below represent the land use and/or business name. The listings identifying a potential REC are in bold.

7750 8 th Ave S	1940 - 1950 Huber Laundry Tray Co, 1955 -1966 vacant
7758 8 th Ave S	1960 - 1935 Residential
	1930 Bridge Auto Supply
7760 8 th Ave S	1996 Silver Bay Logging Equipment Inc, Morton Marine
	1990 Western Marine Construction
	1986 Western Marine Construction
	1980 - 1944 Residence
7766 8 th Ave S	1970 vacant, 1966 - 1920 Residence
7808 8 th Ave S	1996 - 1960 Matson, EM Jr., (slug bait manufacturer)
	1955 under construction
7814 8 th Ave S:	1996 Sovereign Yachts
	1990 Bristol Monarch (marine supplies), Morton Marine Equipment,
	Reagan Marine Services, Work Boats Northwest
	1986 Seaway Express (barge lines)
7900 8 th Ave S	1990 - 1955 Residence
7908 8 th Ave S	1990 - 1951 Residence
803, 811, 820 S Chicago St	1990 - 1966 Residences
812, 819 S Chicago St	1966 - 1975 Residences
831, 837 S Chicago St	1966 - 1970 Residences
827 S. Chicago St	1970 Iverson Construction Co
800 S. Kenyon St	1990- 1996 North Wind Marine
	1986 Service Specialties Inc
	1980- 1975 Iconco (general contractor)
802/806 S Kenyon St	1970 - 1966 Residence (same bldg as 800, readdressed)
824 S Kenyon St	1970 - 1966 Residence
832 s Kenyon St	1966 Residence
836 S Kenyon St	1996 Rasmussen Wire, Rope & Rigging Co
	1990 - 1986 Service Specialties (additional storage)
	1980 - 1975 Iconco (storage)
846 S Kenyon St	1980 - 1966 Residence

6.4 CHAIN OF TITLE

Chain of Title or Title Reports were not provided to EMS. However a preliminary title insurance document was provided by the client. The document includes the easement designations at the Subject Property. Refer to Appendix C; Property Documents.

6.5 SUMMARY OF HISTORICAL RESEARCH

The historical maps and land ownership atlas', directories, and aerial photographs adequately outline the development of the Subject Property and adjacent properties. Records reviewed indicate the first commercial development at the Subject Property as a corner store by 1904 and two stores with a hall above in 1917 at the southwest parcel. By 1929, an automobile repair and battery shop appear at the northwest corner that changes to a concrete wash tray manufacturer by 1940. From 1960 to the present, business occupants of the Subject Property include an insecticide packaging facility, a logging company and several boat manufacturing and supply companies. Three areas of the Subject Property were identified with businesses that are reported to have utilized, stored, or transferred petroleum product and/or other processing chemicals representing historical RECs. In addition, numerous residential dwellings previously identified at the Subject Property may have utilized fuel oil for heat. Although no records were identified that confirm or disprove the type of heating systems of the residential units, the possibility of underground fuel storage tanks exist as a potential environmental concern.

7.0 CONCLUSION

Environmental Management Services, (EMS) has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 for King County Tax Parcels: 7327902500, 7327902520, 7327902480, 7327902490, 7327903645, and 7327906860 located at 7808 and 7814 8th Avenue South, Seattle, Washington. Completion of this Phase I Environmental Site Assessment did not encounter any significant data gaps in historical research.

7.1 FINDINGS

This Phase I ESA has revealed evidence of three on-site historical RECs at Property locations identified with automobile and boat repair, boat manufacturing, logging equipment, and slug bait production are reported to have utilized, stored, or transferred petroleum product, solvents, and/or other processing chemicals. Each of the three REC locations are identified on Figure 3, attached.

Two off-site RECs were identified with the potential to impact the Subject Property. The Lower Duwamish Waterway Superfund Site that includes a portion of the riverbank at the eastern boundary of the Subject Property. Silver Bay Logging Company and other past and present on-site businesses are not named as potentially liable/responsible parties. Each of the two off-site RECs are identified on Figure 3, attached.

The northwestern adjacent property, Interstate Coatings, is listed by the Washington State Department of Ecology as a hazardous waste site with impacted soil confirmed and suspected impact to groundwater.

7.2 OPINION

A subsurface investigation of soil and groundwater is recommended at three former fuel usage, storage, or transfer areas as well as former chemical use areas (slug bait production, engine repair) associated with historical businesses of the Subject Property in order to identify potential on-site impacts from product usage, storage, and/or distribution.

7.3 DEVIATIONS

The objectives of this Phase I ESA are in general accordance with the American Society for Testing and Materials (ASTM) Standard E 1527-05. No deviations from the ASTM 1527-05 were made, except that interviews were not able to be conducted with previous Subject Property

owners. Completion of this Phase I Environmental Site Assessment did not encounter any significant data gaps in historical materials, maps or land ownership.

EMS observations gathered during the site reconnaissance included investigation of improperly stored chemicals, disposal of hazardous, dangerous, or toxic substances. This includes substances as defined under the Resource Conservation and Recovery Act (RCRA-42 USC § 6901, et seq.), the Federal Water Pollution Control Act (33 USC § 1257, et seq.), the Clean Air Act (42 USC § 2001, et seq.), the Comprehensive Environmental Response, Compensation, and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA: 42 USC § 9601, et seq.), the Washington State Dangerous Waste Regulations (173-303 WAC), and the Washington State Model Toxics Control Act (MTCA, 173-340 WAC).

8.0 STATEMENT OF QUALITY ASSURANCE

EMS has performed this Assessment in accordance with current generally accepted environmental practices and procedures. We have employed the degree of care and skill ordinarily exercised under similar circumstances by reputable environmental professionals practicing in this area. The conclusions contained within this Assessment are based upon site conditions observed or were reasonably ascertainable and present at the time of the inspection.

The objective of this Environmental Site Assessment was to ascertain the potential presence or absence of environmental conditions or releases or threatened releases that could impact the subject site, as delineated by the Scope of Work. The Scope of this Assessment does not declare to encompass every report, record, or other form of documentation relevant to the Subject Property being evaluated. Additionally, this Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the Subject Property, although no liens are posted on the Pierce County Assessor website.

The conclusions and recommendations stated in this Report are based upon personal observations made by EMS professionals and also upon information provided by others related to the Subject Property. There is no reason to suspect or believe that the information provided is inaccurate.

8.1 STATEMENT OF REGULATORY COMPLIANCE

This Environmental Assessment has been performed in compliance with requirements set forth in the Standards and Practices for All Appropriate Inquiries; Final Rule ("AAI"); U.S. EPA, 40 CFR Part 312, 70 FR 66070, November 1, 2005.

To the best of our professional knowledge and belief, the professionals associated with this project meet the definition of "Environmental Professional" as defined in § 312.10 of this part. The EMS professionals completing this project have the specific qualifications based on education, training, and experience to assess a Subject Property of the nature, history, and setting of the Subject Property. The All Appropriate Inquiries for this project have been completed in conformance with the standards and practices set forth in 40 CFR Part 312.

8.2 ENVIRONMENTAL ASSESSMENT REPORT LIMITATIONS

This Phase I Environmental Site Assessment has been performed for the exclusive use of Independent Metals Company, and designated agent/ensigns for the real Subject Property transaction at issue concerning:

- 7808, 7814 8th Avenue South, Seattle, Washington

This Environmental Site Assessment has been performed in accordance with generally accepted environmental practices and procedures, as of the date of the Report. All services have been performed employing that degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this, or similar localities. No other warranty or guarantee, expressed or implied, is made or offered.

The conclusions and recommendations stated in this Report are based upon observations made by employees of EMS and also upon information provided by others. We have no reason to suspect or believe that the information provided is inaccurate. However, we cannot be held responsible for the accuracy of the information provided to us by others. The Scope of this Assessment does not assert to encompass every report, record, or other form of documentation relevant to the Subject Property being evaluated. This Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the Subject Property.

The observations contained within this Assessment are based upon site conditions readily visible and present at the time of our site inspection. These site observations are unable to specifically address conditions of subsurface soil, groundwater, or underground storage tanks, unless specifically mentioned. This Phase I Environmental Site Assessment does not attempt to address the past or forecast the future Subject Property conditions.

8.3 REFERENCES & CITATIONS

1. For the purposes of this Assessment, information is considered reasonably ascertainable if it is:
 - (1) Publicly available,
 - (2) Obtainable from its source within reasonable time and cost constraints, and
 - (3) Practically reviewable. (The length of time required to obtain information from the City Building and Zoning Department is considered to be reasonable.)
2. It is a violation of copyright law to photocopy Sanborn Maps regardless of their location or source. This includes maps located at local libraries, universities, historical societies, or private collections. Sanborn Maps contained on microfiche collections are included in the prohibition against photocopying.
3. Solid Waste: defined as garbage, refuse, sludge, and other discarded material including solid, semi-solid, and contained gaseous waste per RCRA 42 USC §6903(27). For visual assessment purposes, any material that is discharged is a solid waste. A majority of the regulatory exclusions do not apply to discharges made within a structure.

4. Regulated Substance: defined as a substance that is:
 - (i) Regulated under RCRA via direct definition; or
 - (ii) Regulated under CERCLA or the Clean Air Act, that may become subject to RCRA regulations as a result of the CERCLA classification.
5. Disposal: defined as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or constituent thereof may enter the environment or be emitted into the air or discharged into the waters, including ground waters, per RCRA 42 USC §6903(3).
6. Refer to, Federal Register Volume 61 Number 9064, March 6 1996, Lead; Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing. 1. EPA and HUD consider "housing constructed before 1978" to mean housing for which a construction permit was obtained before January 1, 1978. If no permit was obtained, then housing in which construction was started before January 1, 1978.
7. This requirement may be satisfied by supplying a pamphlet issued by the U.S. Environmental Protection Agency and the U.S. Consumer Product Safety Commission entitled Protect Your Family from Lead in Your Home. This pamphlet is available from the National Lead Information Clearinghouse at (800) 424-LEAD.
8. The American Conference of Governmental Industrial Hygienists has concluded that there are no mandatory numerical limits against which investigators can compare measurements of air or source concentrations for the majority of substances of biological origin that are associated with building-related exposures.

9.0 TERMS AND DEFINITIONS

Description of Terms Specific to this Report

- **Adjacent Property:** Any real Property located within 0.25 mile of the Subject Property's border.
- **Adjoining Property:** Any real Property whose border is contiguous or partially contiguous with the Subject Property, or it would be if the Properties were not separated by a roadway, street, public thoroughfare, river, or stream.
- **Aquifer recharge area:** means areas where the prevailing geologic conditions allow infiltration rates which create a high potential for contamination of groundwater resources or contribute significantly to the replenishment of groundwater with potential to be used for potable water.
- **ASTM:** Formerly the American Society for Testing and Materials.
- **ASTM Phase I Environmental Site Assessment** the process described in the ASTM practice E 1527 -00/05 ,
- **Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.** The process by which a person or entity seeks to determine if a particular parcel of Subject Property including improvements is subject to recognized environmental conditions. The process does not purport to address all of the safety, environmental concerns, and regulatory compliance applicability associated with its use.
- **Dwelling:** Any structure all or part of which is designed or used for human habitation, i.e.; a place of residence or abode.
- **Field Interview:** The environmental questionnaire normally completed by the site manager that asks the respondent to answer all questions to the best of their actual knowledge and good faith. The answers provide further details on the appropriateness of the investigation and areas of potential environmental concern.
- **Site Manager:** A person identified by the owner of the Subject Property as having the best reliable knowledge of the previous uses, current conditions, and physical characteristics of the Subject Property, and in a position to provide reasonably accurate information for the Field Interview.
- **Obvious:** that which is plain or evident; a condition or fact that could not be ignored or overlooked by a reasonable observer while visually or physically observing the Subject Property.

- **Recognized Environmental Condition(s):** The presence or likely presence of hazardous substances or petroleum products on the Subject Property under conditions that indicate as existing release, a past release, or a material threat of a release of those same substances into structures on the Subject Property or into the ground, groundwater, or surface water of the Subject Property. The term does not include de minimus conditions or those that would not be subject to an enforcement action if brought to the attention of an appropriate governmental agency.
- **Residential building:** Any room, group of rooms, or other ulterior areas of a structure designed or used for human habitation; common areas accessible by inhabitants; and the surrounding Subject Property or structures.

10.0 PROJECT REFERENCES

- American Society for Testing and Materials (ASTM), ASTM E 1527 – 00/05: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
- Environmental Data Resources, dated March 16, 2010. Radius database report for 7808, 7814 8th Avenue South, Seattle, Washington 98108, Report Number 2721506.2s.
- Environmental Protection Agency (EPA), April 1994, Reducing Lead Hazards When Remodeling Your Home, EPA 747-R-94-002, 20 pps.
- Environmental Protection Agency, September 1987, Radon Reference Manual EPA 520/1 87-20.
- Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, FEMA/FIRM. Accessed March 18, 2010 (<http://www.ecy.wa.gov/services/gis/maps/wria/flood/flood.htm>)
- Troost, K. Goetz, Booth, Derek. B., Wisher, Aaron P. and Shimel, Scott A. The Geologic Map of Seattle - A Progress Report, Prepared for the 5th Washington Hydrogeology Symposium, April 2005
- Pacific Northwest Center for Geologic Mapping Studies, Department of Earth and Space Sciences - University of Washington, P.O. Box 351310, Seattle, Washington 98195-1310 (<http://geomapnw.ess.washington.edu>)
- Standards and Practices for All Appropriate Inquiries; Final Rule ("AAI"); U.S. EPA, 40 CFR Part 312, 70 FR 66070, November 1, 2005.
- Walters, K. L. and Kimmel, G. E., 1968, *Groundwater Occurrence and Stratigraphy of Unconsolidated Deposits, Central King County, Washington*, United States, Geological Survey Water Supply Bulletin 22.

Agencies Contacted:

City of Seattle

- Fire Department

King County

- Assessor's Office
- Environmental Health Department

State of Washington

- Washington Department of Ecology